

FILED
CHARLOTTE, NC

DEC 14 2022

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA) DOCKET NO. 1:22CR72
)
) SUPERSEDING
) BILL OF INDICTMENT
vs.)
) Violations:
) 18 U.S.C. § 875(c)
1) TIMOTHY MICHAEL DEAVER,) 18 U.S.C. § 1201(c)
2) DARRIS GIBSON MOODY,) 18 U.S.C. § 2
 a/k/a Darris-Terraine; Gibson-Moody.)
 a/k/a Darris Gibson 'last name of Moody')
 a/k/a :Darris-Terraine; Moody.)
3) DEE THOMAS MURPHY,)
 a/k/a Deetom)
 a/k/a Dee Thomas)
 Defendants.)
)

THE GRAND JURY CHARGES:

COUNTS ONE through SIXTY-TWO
18 U.S.C. § 875(c)
(Interstate Threatening Communications)

On or about the dates set forth in the table below, in Haywood County, within the Western District of North Carolina, and elsewhere, the defendants

- 1) TIMOTHY MICHAEL DEAVER
- 2) DARRIS GIBSON MOODY, and
- 3) DEE THOMAS MURPHY

knowingly and willfully did transmit, in interstate and foreign commerce, communications, those being so-called "Wrts of Execution" sent by fax and other means, containing threats to kidnap the persons referenced in the table below, and did aid and abet each other in so doing.

The defendants transmitted the communications for the purpose of issuing the threats, and with knowledge that the communications would be viewed as threats.

<u>COUNTS</u>	<u>OFFENSE DATES</u>	<u>VICTIMS' INITIALS</u>
ONE	6/24/2022	GC
TWO	6/25/2022	JH
THREE	6/27/2022	SM
FOUR	6/27/2022	GC
FIVE	7/2/2022	JWK
SIX	7/3/2022	WHG
SEVEN	7/3/2022	ADB
EIGHT	7/3/2022	KHC
NINE	7/3/2022	JDF
TEN	7/3/2022	CSS
ELEVEN	7/3/2022	JBF
TWELVE	7/5/2022	CHD
THIRTEEN	7/10/2022	DAS
FOURTEEN	7/10/2022	JMB
FIFTEEN	7/10/2022	RDF
SIXTEEN	7/10/2022	DMD
SEVENTEEN	7/11/2022	MSR
EIGHTEEN	7/11/2022	LD
NINETEEN	7/14/2022	DFF
TWENTY	7/14/2022	AW
TWENTY-ONE	7/16/2022	LDH
TWENTY-TWO	7/16/2022	ZLS
TWENTY-THREE	7/16/2022	PS
TWENTY-FOUR	7/16/2022	DAB
TWENTY-FIVE	7/16/2022	RDC
TWENTY-SIX	7/16/2022	RER
TWENTY-SEVEN	7/16/2022	SDK
TWENTY-EIGHT	7/16/2022	LHN
TWENTY-NINE	7/16/2022	JMR

THIRTY	7/16/2022	CHF
THIRTY-ONE	7/16/2022	JHF
THIRTY-TWO	7/17/2022	RW
THIRTY-THREE	7/17/2022	KW
THIRTY-FOUR	7/17/2022	AMB
THIRTY-FIVE	7/17/2022	JG
THIRTY-SIX	7/17/2022	DEM
THIRTY-SEVEN	7/17/2022	TLB
THIRTY-EIGHT	7/17/2022	EEM
THIRTY-NINE	7/17/2022	LHS
FORTY	7/17/2022	QM
FORTY-ONE	7/21/2022	PN
FORTY-TWO	7/21/2022	SE
FORTY-THREE	7/21/2022	RH
FORTY-FOUR	7/21/2022	ASE
FORTY-FIVE	7/25/2022	CMV
FORTY-SIX	7/25/2022	KYBS
FORTY-SEVEN	7/25/2022	HH
FORTY-EIGHT	7/25/2022	AH
FORTY-NINE	7/25/2022	JJ
FIFTY	7/25/2022	JP
FIFTY-ONE	7/25/2022	GCB
FIFTY-TWO	7/25/2022	TH
FIFTY-THREE	7/25/2022	LCB
FIFTY-FOUR	7/30/2022	RM
FIFTY-FIVE	7/30/2022	KEW
FIFTY-SIX	7/30/2022	CNA
FIFTY-SEVEN	7/30/2022	LAT
FIFTY-EIGHT	7/30/2022	AFB
FIFTY-NINE	7/30/2022	LAB
SIXTY	7/30/2022	AMC
SIXTY-ONE	8/7/2022	TWS
SIXTY-TWO	8/7/2022	RFJ

All in violation of Title 18, United States Code, Sections 875(c) and 2.

COUNT SIXTY-THREE
18 U.S.C. § 1201(c)
(Conspiracy to Commit Kidnapping)

Beginning on a date unknown to the Grand Jury, but at least as early as April 2022, and continuing until on or about September 7, 2022, in Haywood County, within the Western District of North Carolina, and elsewhere, the defendants

- 1) TIMOTHY MICHAEL DEAVER**
- 2) DARRIS GIBSON MOODY, and**
- 3) DEE THOMAS MURPHY**

did conspire, confederate, and agree with one or more other persons, both known and unknown to the Grand Jury, to unlawfully kidnap, seize, confine, inveigle, decoy, abduct, and carry away other persons, and hold them for ransom, reward, and otherwise; and, in committing and in furtherance of the commission of the offense,

- a. to transport them in interstate and foreign commerce,
- b. and to use any means, facility, and instrumentality of interstate and foreign commerce, those being the internet, the cellular telephone network, automobiles, and the interstate highway system.

Overt Acts

In furtherance of the kidnapping conspiracy, and to effect its object of holding those kidnapped for ransom, reward, and otherwise, **1) TIMOTHY MICHAEL DEAVER, 2) DARRIS GIBSON MOODY, and 3) DEE THOMAS MURPHY**, and others both known and unknown to the Grand Jury, committed the following overt acts, among others:

1. Identified and conducted research, online and elsewhere, of the names, professional titles, phone numbers, and addresses of potential targets for kidnapping, including those victims referenced in Counts One through Sixty-Two in this Bill of Indictment.
2. Downloaded, filled out, produced, and completed so-called "Writs of Execution," documents alleging that the recipients had been convicted of

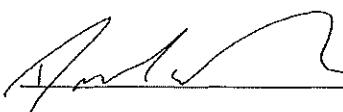
crimes and were subject to citizen's arrest, and offering financial rewards to anyone conducting these citizen's arrests.

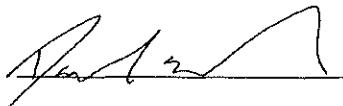
3. Delivered these so-called "Writs of Execution," by fax and other means, to the victims, including those referenced in Counts One through Sixty-Two in this Bill of Indictment.
4. Posted the personal identifying information of the victims, including those referenced in Counts One through Sixty-Two in this Bill of Indictment, to a publicly accessible website to indicate that they had been served with the so-called "Writs of Execution" and to identify them as targets for kidnapping by co-conspirators and others.
5. Created, hosted, maintained, and posted information and commentary to a website promoting the conspiracy that contained documents, videos, instructions, discussion forums, and other materials for the co-conspirators, and others, to assist them with carrying out the object of the conspiracy.

All in violation of Title 18, United States Code, Section 1201(c).

A TRUE BILL

DENA J. KING
UNITED STATES ATTORNEY


[Handwritten signature of Dana J. King over a horizontal line]
for DON GAST
ASSISTANT UNITED STATES ATTORNEY


[Handwritten signature of David A. Thorneloe over a horizontal line]
DAVID A. THORNELOE
ASSISTANT UNITED STATES ATTORNEY